

APPENDIX F

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1 Women Voters of the Grand Traverse Area -- I'm
2 assuming it was the Grand Traverse Area League that
3 created this document -- was created as a
4 provisional chapter in '59 and so forth.

5 So this particular document was adapted
6 it looks like by the Grand Traverse League. It is
7 dated 2017 and has some information in it that is
8 now updated this now being 2018.

9 Q So I had mentioned specifically that my question
10 relates to material on page 3 under the
11 membership --

12 A Yes.

13 Q -- categories.

14 Having reviewed those membership
15 categories as described in the document, do you see
16 the list of categories? "Associate members,
17 household membership, life members, members at
18 large, and voting members"?

19 A I see those.

20 Q Are those membership categories consistent with
21 your understanding of the current League membership
22 structure?

23 A No.

24 Q What has changed?

25 A I think I might have mentioned that at the last

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1 national convention which determines what
2 qualifications for membership might be for all
3 League members no matter where you live, we lowered
4 the age from 18 to 16. And I believe at the
5 convention -- I'm not sure if it was that
6 convention or another one -- where there was a
7 differentiation between citizens and noncitizens
8 was removed. So now, as I mentioned a few minutes
9 ago, the only requirement to be a League member is
10 that you be 16 or older. There is no requirement
11 that you be a citizen. So we no longer have that
12 category "associate members."

13 Q I see. So associate membership is done, and now
14 any person under the age of 18 --

15 A No.

16 Q -- over the age of 16 --

17 A Over the age of 16 can join the League.

18 Q So persons between 16 and 18 as well as noncitizens
19 would now be in one of the other four categories
20 listed? They would not be considered associate
21 members, correct?

22 A Correct.

23 Q Does the League have any guidelines, written
24 guidelines, on the conduct of its members
25 concerning partisan activities?

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1 during the time that I hold office in the League.

2 The constraints for board members who are
3 not officers are different than they are for the
4 officers.

5 Q I want to return to the exercise that you described
6 earlier wherein personnel from the League contacted
7 members of the League.

8 A Uh-huh.

9 Q I asked you if you had brought the script today and
10 you said you have not.

11 A Correct.

12 Q Can you tell me what questions were in the script?

13 A I can tell you what I remember, I can't tell you
14 whether it's an exhaustive list or not.

15 Q Please do.

16 A One of the questions was, of course, to confirm
17 their name and address. We asked them if they were
18 a registered voter. No, I don't know that I -- I'm
19 sorry, let's strike that. I don't remember that.
20 I know you asked me, and I don't know for sure.

21 We did ask them if they voted in the 2016
22 election, which would certainly imply that they
23 were a registered voter, but -- especially at
24 the -- on the state races, and did they vote for
25 Democrats in the state races in 2016, and if they

1 said yes, then we asked them about their level of
2 participation. Were they a member of the
3 Democratic Party? Did they support Democratic
4 candidates with money or time? Did they attend
5 activities sponsored by the Democratic Party? So
6 forth.

7 Q Do you recall, did you ask -- not you personally I
8 mean but the League --

9 A Uh-huh.

10 Q -- did they ask anything concerning prior elections
11 to 2016?

12 A I think there were, in some instances, conversation
13 about the 2014 election.

14 Q Were there any questions about the -- I'm sorry, I
15 didn't mean to cut you off.

16 A Go ahead.

17 Q Was that your complete answer?

18 A Yes.

19 Q 2014? Okay. Were there any questions about the
20 2018 election and their intent to vote in 2018?

21 A No.

22 Q What about in 2020?

23 A No.

24 Q Were there questions about particular candidates
25 they had voted for or merely whether they had

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1 voted?

2 A It was the statewide races.

3 Q There were no questions about individual
4 congressional races?

5 A Well, when I say state races, I'm referring to
6 votes for the state Legislature, the House or the
7 Senate. Certainly, when you vote for your
8 congressional representative, it's a representative
9 from Michigan, so that would -- that would have
10 been included.

11 Q So to clarify, when you said state -- you made
12 inquiry as to state races or statewide races,
13 you're talking about inquiries as to whether they
14 voted for a particular candidate --

15 A No.

16 Q No. You asked them whether they voted for state
17 representative?

18 A We asked them if they voted for a Democrat in the
19 state races such as the State House, State Senate,
20 congressional race. We were differentiating
21 between those races and a federal race, like the
22 president for example.

23 Q Well, Congress would be a federal race. Did you
24 ask them if they voted for a Democrat for Congress?

25 MR. YEAGER: Objection, asked and

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1 answered.

2 You may answer.

3 THE WITNESS: Again, as I -- and we, as
4 discussed, I don't have the script in front of me
5 so I don't have the exact questions. It was
6 certainly our intent to find out if they voted for
7 Democrats, the State House, the State Senate, the
8 U.S. Congress.

9 Q (MR. SHANNON) Did you ask them if they voted for a
10 party nominee or did they write in a Democrat?

11 A We just said did they vote for a Democrat.

12 Q Did you ask them if they voted in the general or in
13 the primary?

14 A Again, I'd have to go back and look at the question
15 to be sure whether there was a differentiation
16 about that or not.

17 Q Did you ask them if they split their ticket at all?

18 A No, we just asked them did you vote Democrat in
19 those elections that I've already described.

20 Q Did you ask them about their political affiliation
21 as of December of 2017?

22 A December of 2017?

23 Q Correct.

24 A No.

25 Q Can you tell me the time frame when this exercise

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1 A Right.

2 Q Senate District 2 --

3 A Uh-huh.

4 Q -- and the congressional district is blank. So why
5 would this be left blank?

6 A Well, for some reason when this was prepared -- and
7 as I said, I was not present when they figured out
8 how to do it -- they -- they concentrated on the
9 House districts. And sometimes the names above and
10 below -- for example, if you look at the
11 congressional district column, sometimes the names
12 above and below the number that were there were
13 also in that same district, so -- District 14 -- so
14 it's possible that Mr. Killeen was in District --
15 Congressional District 14, I don't know.

16 I raised that issue with Judy Karandjeff
17 when she showed me this list and I started working
18 with it. I said, well, what does it mean on these
19 congressional -- she did not attempt to put down
20 for every individual what Senate district they were
21 in, what congressional district they were in, and
22 so we had to verify that in other ways once we
23 figured out who was on the list.

24 Q Returning to House District 83 in Exhibit 4 --

25 A In the long list?

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1 A I take your word for it in terms of the math.

2 Q Okay. And I'm sure we can move forward on the
3 basis that there are a large number of League
4 members in House District 69?

5 A There are.

6 Q Okay. Does that district, House District 69 which
7 covers Lansing and East Lansing, does that district
8 typically vote Democrat or Republican, if you know?

9 A I don't know.

10 Q Okay. So I'm going to define a term for you now.
11 I'm going to use the word "inadequate," and I'm
12 going to use that in reference to a representative,
13 an elected official.

14 A As an inadequate representative?

15 Q Correct.

16 A Are you talking about the person?

17 Q The person. And so by inadequate, I'm meaning that
18 the representative is not responsive to a voter or
19 ignores issues that are important to that voter,
20 okay?

21 Do you know if any of the League members
22 listed in House District 69 feel that their
23 representative is inadequate?

24 A I don't know.

25 Q Do you know if any League member in any district

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1 feels their representative is inadequate?

2 A Any League member in any district in the state
3 feels their representative -- are we talking about
4 the House representative?

5 Q Just the House, yes.

6 A I have heard general conversations, but I can't
7 give you specifics.

8 Q Do you know which League members those
9 conversations involved?

10 A I do not.

11 Q What about for the State Senate? Same question.
12 Do you know if any League members in any Senate
13 district feel their representative is inadequate?

14 A I have heard comments to that effect, yes.

15 Q Specifically, do you know which League members?

16 A I cannot tell you which League members said that to
17 me.

18 Q Same for Congress. Do you know of any League
19 members in any congressional district who feel
20 their congressperson is inadequate?

21 A I have heard the comment.

22 Q Specifically do you know which League members?

23 A I cannot give you a name.

24 Q Do you know if any of the 103-odd League members
25 living in House District 69 feel that they have

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1 A I told you I can't give you names of specific
2 members. You asked me did I recall any member. I
3 remember conversations at League meetings, people
4 expressing their opinions about their relationships
5 with their representatives. I do not and cannot
6 give you specific names.

7 Q Do you recall which specific representative?

8 A Talking just the House?

9 Q Just the House.

10 A No.

11 Q What about for the Senate, the same question. Do
12 you recall any specific member of the League
13 expressing concern to the League or others about
14 their ability to access or express their views to
15 any member of the Michigan Senate?

16 MR. YEAGER: The same objection.

17 You may answer.

18 THE WITNESS: I recall people expressing
19 frustration over their ability to access their
20 senator, but I do not recall the names of those
21 individuals.

22 Q (MR. SHANNON) And, finally, for Congress, same
23 question.

24 A Yes, I recall League members expressing frustration
25 over their ability to access their U.S.

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1 congressperson.

2 Q Do you recall which specific League members?

3 A I do not recall which specific League members.

4 Q Do you recall which specific congressmen?

5 A Hmm. He was over from the west side of the state.

6 Can't remember his name.

7 Do you have a list of the senators?

8 Q The congressmen?

9 A I mean the congresspeople?

10 Q I don't have one with me.

11 A Somebody that's over on the west side of the state.

12 Q Do you remember the specific concern expressed
13 regarding access?

14 A Yes, and, actually, it's a concern that League
15 members have expressed to me in a number of places
16 across the state, and that there are two instances
17 where League members interact with people who are
18 their representatives in the House or the State
19 Senate or the U.S. Congress. One of those times
20 when they interact is when we hold candidate
21 forums, such as we've been holding this past summer
22 and will hold this fall, where those who are
23 running for office -- and, of course, many of them
24 are incumbents -- are invited to come and do a
25 public meeting and present their views and their

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1 A No.

2 Q All right. Just one more set of questions here and
3 I think we'll be done.

4 I'm going to define one more term for
5 you. I'm going to use the term "community of
6 interest." By community of interest I mean people
7 who share a common interest or a passion in a
8 particular matter.

9 A Such as?

10 Q I gave you the example before of farmworkers, union
11 members. Those aren't exclusive examples, there
12 can be many different types of communities of
13 interest, but I'm talking generally about people
14 who share a common interest or a common trait and
15 might work together as a community. Do you
16 understand?

17 A Yes.

18 Q Okay. Do you know of any Democrat League member
19 who as a result of the 2011 redistricting plans was
20 cut off from their natural community of interest?

21 A Yes, I've heard --

22 Q Which League member?

23 A I cannot give you a name. I've heard many
24 complaints about the 2011 maps, and it's often been
25 that communities have been broken up.